

**MCLAUGHLIN & STERN, LLP**

**FOUNDED 1898**

**TRACY A. BURNETT**  
Partner  
tburnett@mclaughlinstern.com  
Direct: (212) 448-1100 ext. 1246

260 MADISON AVENUE  
NEW YORK, NEW YORK 10016  
(212) 448-1100  
FAX (212) 448-0066  
www.mclaughlinstern.com

GREAT NECK, NEW YORK  
MILLBROOK, NEW YORK  
WESTPORT, CONNECTICUT  
WEST PALM BEACH, FLORIDA  
NAPLES, FLORIDA

October 6, 2023

Via ECF

Honorable Arun Subramanian, U.S.D.J.  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

Re: United States v. Edward O'Donnell, 23 Cr. 499

Dear Judge Subramanian:

We represent Edward O'Donnell in the above-referenced matter. We are writing to request an extension of time for Mr. O'Donnell to meet the conditions of his bond.

Pursuant to the conditions of release, Mr. O'Donnell's personal recognizance bond must be signed by two financially responsible persons. Mr. O'Donnell has identified two financially responsible persons who have agreed to co-sign the bond – Judith Moraglia and Christopher King. We are working with the U.S. Attorney's Office on coordinating the logistics of getting approval for the two co-signers. Mr. O'Donnell moves this court for an additional week, from October 5, 2023 to October 12, 2023, to return the fully executed personal recognizance bond.

He has fully complied with all other conditions of his release, and will continue to comply with the conditions of his release.

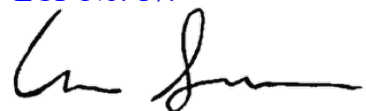
The undersigned wrote to the Government to seek their consent to this request, and has not heard back.

Respectfully submitted,

/s/ Tracy A. Burnett  
Tracy A. Burnett

cc: Kiersten Fletcher, AUSA

SO ORDERED. The Clerk of Court is directed to terminate the motion at ECF No. 17.



Arun Subramanian, U.S.D.J.  
Date: October 10, 2023

Allison Nichols, AUSA  
Margaret Graham, AUSA  
(Via ECF)